



NATIONAL ASSOCIATION OF THE DEAF

301-587-1788
814 THAYER AVENUE
SILVER SPRING, MARYLAND 20910

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January 17, 1996

Mr. William Caton
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: MM Docket No. 95-176

Dear Mr. Caton:

Please find enclosed a request for an extension of time in the above captioned proceeding. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Karen Peltz Strauss".

Karen Peltz Strauss
Supervising Attorney

Enclosure

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REQUEST FOR EXTENSION OF TIME TO SUBMIT COMMENTS

The National Association of the Deaf herewith submits a request for an extension of thirty (30) days to submit comments and reply comments on the above captioned Notice of Inquiry (NOI) and states the following:

1. On December 4, 1995, the Federal Communications Commission (Commission) released an NOI on closed captioning and video description services. The NOI requests comprehensive information on all aspects of these services, including their availability, benefits, uses, supply, costs, and funding sources. Additionally, the NOI seeks information on the need for the Commission to promulgate rules requiring these services, including the extent to which market incentives would result in the provision of such services, and appropriate timetables for and exemptions from possible requirements. Finally, the Commission seeks comments on its authority to promulgate captioning and video description requirements absent passage of the pending telecommunications legislation.

2. The Commission set January 29, 1996 as the date by which comments on the NOI are due. However, since being released, a number of events have transpired that make meeting this deadline extremely difficult, if not impossible. Specifically, the

extremely difficult, if not impossible. Specifically, the following events took place:

a. Gallaudet University announced the closing of the National Center for Law and Deafness, effective January 19, 1996. The Law Center was given only seven weeks notice of its closing date after being in operation for twenty years. Historically, the National Center for Law and Deafness has played a key role in coordinating and preparing comments on Commission proceedings affecting telecommunications and television access. Yet because the time allotted for shutting down and transferring operations was so short, the Law Center had little or no time to begin to address the matters raised in the NOI. The National Association of the Deaf (NAD) will be assuming the role formerly filled by the Law Center in addressing telecommunications matters raised by the Commission. In that capacity, NAD seeks additional time to gather the comprehensive information needed to properly respond to the Commission's Inquiry.

b. The "Blizzard of '96" occurred, causing private and governmental offices to shut down for approximately one week, further impeding our ability to gather the information needed for a proper response to the NOI.

c. The Christmas vacation occurred, removing from the comment period an additional one week to ten days, when many individuals were out of town or otherwise unavailable.

d. The budget crisis resulted in a furlough of approximately one month for governmental agencies, such as the

Department of Education, from whom the Commission has requested comprehensive information to assist in this proceeding. In addition, the budget crisis resulted in a furlough of most Commission employees, presumably delaying work on other proceedings on which the Commission is focusing its attention. This suggests that an extension of time would not unduly or adversely affect Commission employees assigned to review these comments.

3. The provision of closed captioning services for video programming is a top priority for virtually all of the deaf and hard of hearing community. It is critical that the Commission afford ample time for this community to provide comprehensive and cohesive comments on a matter of such significance. For this reason, and in light of all of the above events, we request an extension of thirty (30) days, to submit comments and reply comments on this NOI.

Respectfully submitted,



Karen Peltz Strauss
Legal Counsel for Telecommunications Policy
National Association of the Deaf
814 Thayer Avenue
Silver Spring, MD 20910
(301-587-1788)

January 17, 1996